



Deephams Sewage Works Upgrade

Statement of Community Involvement

Prepared by Adams Hendry Consulting Ltd
for Thames Water Utilities Ltd
June 2014

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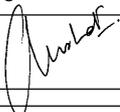
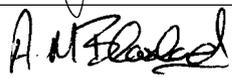
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ADAMS HENDRY CONSULTING LTD
Multi Award Winning Chartered Town Planners

7 St Peter Street, Winchester, SO23 8BW
T 01962 877414
E info@adamshendry.co.uk
W www.adamshendry.co.uk

	Name	Signature	Date
Author	Akshat Vipin		June 2014
Checked by	Andy Blaxland		June 2014

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1 Introduction

- 1.1 Thames Water Utilities Ltd (hereafter referred to Thames Water) is a statutory water and sewerage undertaker and the UK's largest water and wastewater services company, serving around 15 million customers across London and the South East of England.
- 1.2 This Statement of Community Involvement sets out the planning policy context for community involvement (Section 2) and explains how Thames Water has consulted key stakeholders and the wider community (Section 3 to 8) on the preparation of the proposals for the Deephams Sewage Works Upgrade (the Upgrade). This consultation and engagement has been secured through two formal stages of public consultation, together with informal engagement and communication with customers, stakeholders and interested parties.
- 1.3 This Statement of Community Involvement also sets out a summary of engagement by stakeholder (Section 9), and how Thames Water intends to engage with stakeholders and the wider community throughout the determination process for the planning application, and the construction of the Upgrade (Sections 10 to 12). A summary and conclusion on the consultation process is presented as Section 13.
- 1.4 Thames Water has received positive feedback from London Borough of Enfield (LBE) and other stakeholders on the quality of the engagement and consultation that has been undertaken, and the degree to which Thames Water has actively sought to engage with the local community on the Upgrade proposals.

2 Planning Policy Context

National Planning Policy Framework (NPPF)

- 2.1 More effective community involvement is a key element of the Government's planning reforms. The NPPF emphasises the importance of community involvement to planning and the achievement of sustainable development. Paragraph 188 of the NPPF confirms that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. The NPPF states *"Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community"* (paragraph 188).
- 2.2 The NPPF states that local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage (paragraph 189). It states that, the more issues that can be resolved at pre-application stage, the greater the benefits (paragraph 190). The NPPF also identifies that for statutory planning consultees' role in the planning system to be effective and positive, they need to take an early, pro-active approach, and provide advice in a timely manner throughout the development process (paragraph 190).
- 2.3 The NPPF supports the participation of other consenting bodies in pre-application discussions, which should enable early consideration of all fundamental issues relating to whether a particular development will be acceptable in principle. Wherever possible parallel processing of other consents is encouraged to help speed up the process and resolve any issues as early as possible (paragraph 191).
- 2.4 In addition, the NPPF states that the right information is crucial to good decision taking, particularly where formal assessments are required. To avoid delay, applicants are required to engage with local planning authority and expert bodies as early as possible regarding information requirements (paragraph 192).
- 2.5 Paragraph 195 of the NPPF encourages applicants and local planning authorities to consider the potential of entering into planning performance agreements, where this might achieve a faster and more effective application process.

LBE Statement of Community Involvement

- 2.6 The context for community development and pre-submission consultation in Enfield, is provided by LBE's Statement of Community Involvement (SCI), which was adopted by LBE on 28 June 2006. The SCI sets out standards for involving the community in the preparation and revision of both Local Development Framework Documents as well as planning applications. The standards set out in the SCI are intended to enable LBE to achieve its vision to *"Inclusive and effective community involvement, which enables the community to participate in and contribute to the future development of the Borough"* (paragraph 1.2.1).
- 2.7 LBE's main principles for community involvement include access to information; the opportunity to contribute ideas, the opportunity to take an active part in developing proposals and options, the opportunity to be consulted and make representations on formal proposals, and the opportunity to get feedback and be informed about progress and outcomes (paragraph 1.2.1).
- 2.8 Paragraph 5.1.3 of the SCI encourages applicants to *"use participation techniques at the pre-application stage to enable the community to contribute towards developing*

proposals. Information will be provided and consultation methods will be used at the application stage, to encourage the community to comment on proposals, and feedback will be provided at the post application stage”.

- 2.9 The SCI states that LBE aims to involve the community as a whole. To achieve this the SCI identifies that a variety of community involvement methods need to be used, including targeted consultation of stakeholders and interest groups, depending upon their expertise and interest, and the nature and content of the planning application (paragraph 3.1.1).
- 2.10 Section 3.3 of the SCI identifies the following methods for engaging with the community in the preparation and revision of planning applications and local development documents:
- Information made available through direct mailing letters, LBE buildings or on LBE’s website / other organisations’ websites
 - Information made available in newsletters
 - Information made available to / consultation with local community groups
 - Media
 - Questionnaires and Surveys
 - Public Exhibitions
 - Video or Audio Presentation
 - Public Meetings / Area Meetings
 - Interest Forums, Groups, Committees and Panels
 - Focus Groups or Workshops
 - One-to-One meetings
 - Planning for Real
 - Planning Panels
- 2.11 The SCI identifies that the *“Council’s approach towards consultation is to concentrate resources, by undertaking additional consultation on proposals that give rise to local controversy, involve sensitive sites or are significant in scale – ‘significant applications’”* (paragraph 5.1.2). The SCI encourages developers to use participation techniques at the pre-application stage to enable the community to contribute towards developing proposals (paragraph 5.1.3).
- 2.12 Paragraph 5.2.1 of the SCI identifies that there is no statutory requirement to involve the community at pre-application stage. However, the SCI encourages developers to undertake pre-application consultation with the community on proposals for significant developments. Developers of significant proposals are therefore encouraged to contact LBE at an early stage to establish a development team, consisting of the developer and planning officers, to agree the approach to pre-application consultation.
- 2.13 The SCI states that pre-application consultation should *“comply with the principles and approach to community involvement set out in sections 1 and 2”* of the SCI, and should *“use different consultation techniques depending upon the type of proposal and the communities that need to be involved”* (Paragraph 5.2.2).
- 2.14 The SCI also states that a pre-application consultation statement should be provided by the developer to set out who was consulted, how they were consulted, a summary of comments made and details of how the comments have informed the proposal (Paragraph 5.2.2).

- 2.15 Section 5.3 of the SCI sets out the statutory consultation requirements that LBE is required to comply with once the application has been submitted. For significant applications, the SCI recommends additional consultation to be carried out depending upon the proposal and site circumstances. In such circumstances the SCI states that developers will be encouraged to provide the community with information and updates on large scale or phased developments using websites, public exhibitions and newsletters (paragraph 5.3.5).

3 Thames Water's Communications Strategy

- 3.1 Thames Water developed a Consultation Strategy (attached as Appendix 3) for the Deephams Sewage Works Upgrade in consultation with relevant stakeholders and the relevant local authorities to meet the requirements identified in LBE's Statement of Community Involvement as set out above. The Consultation Strategy sets out Thames Water's approach and indicative timetable for consulting all those with an interest in the Upgrade. This includes the local community, key stakeholders and statutory consultees.
- 3.2 In addition to the Consultation Strategy, Thames Water initially prepared a Statement of Community Consultation (SOCC) (attached as Appendix 4). The SOCC was prepared for the first formal phase of public consultation, in accordance with the requirements of the Planning Act 2008 regarding Nationally Significant Infrastructure Projects (NSIPs). This SOCC was required as some of the options under consideration at that stage may have been classified as a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008, for which an application for development consent would be submitted to the Planning Inspectorate, rather than a planning application to LBE. There are specific statutory requirements for consultation related to NSIPs, the first stage of which is a preparation of a SOCC.
- 3.3 Subsequent to that stage of work and the Phase 1 public consultation, it has been confirmed by Thames Water and LBE (in its response to the consultation) that the Upgrade is not an NSIP. Notwithstanding this, Thames Water has sought to ensure that the consultation process it has followed is compatible with the requirements of both the planning permission and development consent order routes to consent.
- 3.4 The overriding aim of the Consultation Strategy is to ensure that both community and technical consultees have a chance to be informed and to influence proposals for the Deephams Sewage Works Upgrade prior to the planning application being submitted. This means that:
- The local and strategic impacts and benefits of the Upgrade relating to river water quality and sewage treatment will be explained.
 - Members of the public in the vicinity of the development site, should be consulted in good time during the evolution of the Upgrade, enabling them to have a meaningful say and to influence its design and development.
 - All parties, ranging from statutory interests through to local business, local communities, seldom heard or harder to reach groups and individual residents, should have good access to accurate and high-quality information on the Upgrade, communicated at all stages of the planning process and beyond.
- 3.5 The following main group of consultees were identified:
- Community consultees, including the general public, local property owners / occupiers, local businesses, community representatives and groups, including hard to reach groups or seldom heard groups within the 'consultation zone'. This zone is defined as within 250m from the boundary of each shortlisted site (at the phase 1 consultation only) and within 1km from the boundary of the preferred site.
 - Technical consultees, including local and regional authorities, other statutory consultees, utilities and pan-north London and pan-London strategic stakeholders. A list is provided in Appendix 1.

Community consultees

- 3.6 Community consultees includes the general public within the consultation zone as well as the ward councillors, the local MPs, community representatives, individuals or organisations and local business representatives that formally or informally represent local interests. This includes, but is not limited to:
- Individuals, owners/occupiers, local businesses and groups based or living in the area
 - Individuals, owners/occupiers, businesses and groups who live or work further away, but have, or represent, an interest in the proposed site or sites
 - Area forums, partnerships, civic forums and community groups
 - Local environmental groups
 - Voluntary organisations (including residents' associations and Black, Asian, and minority ethnic support groups)
 - Faith communities
 - Schools and colleges
 - Local hospitals, care homes and private healthcare organisations
 - Disability networks.
- 3.7 Thames Water asked the relevant local authorities for their help to identify all those groups noted above with a potential interest in a site and will continue to seek their views on the best ways to engage with particular groups.

Technical consultees

- 3.8 In addition to the community, Thames Water consulted the relevant technical consultees. These are defined as the affected local authorities, adjoining local authorities, the Greater London Authority and other statutory consultees as listed in Appendix 1.
- 3.9 Engagement meetings were held with key stakeholders. These indicated support for consultation with key stakeholders through a Stakeholder Forum.
- 3.10 A Deephams Stakeholder Forum was set up and met quarterly, or when required. The first Forum meeting took place on 15 July 2011. The Forum discussed the planning and delivery of the proposed Upgrade and strategic issues arising from it, initiating various working groups where needed. The working groups took forward specific matters relating to working methods and practices and fed back to the Forum. Working groups have covered the assessment methodology; consultation strategy; site selection; treatment technologies; transport; odour, and renewable energy. Invitees of the Forum include the following:
- Representatives from the local authorities likely to be affected by the proposed Deephams Sewage Works Upgrade
 - Representatives from consent granting bodies and other pan-north London statutory stakeholders
 - Representatives from environmental bodies
- 3.11 A list of the Stakeholder Forum members is provided as Appendix 2.

Communications programme

- 3.12 Thames Water's communication programme aimed at explaining the need and rationale for the proposed Upgrade development and to support the consultation

process. At each consultation phase, a range of short documents was prepared specifically for local communities, summarising the proposals and outlining the matters on which the view of the local community were sought. They also described the need for the Upgrade, key aims and objectives of our proposals, and explained what the potential impacts might be. These documents also stated where and when public exhibitions and any other events would be taking place, where full sets of the consultation documents may be viewed locally and the date by which responses to the consultation must be submitted. These documents were made available online, at exhibitions or other events held by Thames Water, and on request. Key leaflets were translated into a number of alternative languages reflecting the local community including: Greek, Turkish, Bengali, Polish, Somali and French.

3.13 The communication programme activities included:

- Attendance at open events and in response to requests for presentations to interested groups
- Media relations work – coverage of the Upgrade by local media was sought
- The provision of information via Thames Water's Deephams Sewage Works Upgrade consultation website, including, for example, a calendar of engagement activities and latest news articles that were regularly updated
- A rolling programme of talks and briefings for a wide range of stakeholder and community groups
- The running of a regular Stakeholder Forum
- The dissemination of leaflets and posters about the project and consultation at public buildings such as libraries, council offices, transport hubs, shopping areas and generally in the local area

3.14 Thames Water used a range of approaches designed to meet the requirements of the audiences Thames Water aimed to engage. The approach was based on the following main elements:

- The Deephams Sewage Works Upgrade consultation website
- The use of posters and dissemination of leaflets at public buildings such as libraries, council offices, transport hubs and generally in the local area to promote consultation events and give information on the proposed Upgrade
- Briefings with local community representatives and community groups
- Provision of written information in local libraries, town halls or other public places
- A programme of public exhibitions where people were given the opportunity to meet staff from the Upgrade project team, ask questions and receive help with completing paper feedback forms

3.15 Overall the strategy has been designed to enable a long-term discussion with customers and stakeholders throughout the following four phases of the proposed Upgrade:

- Pre-submission of the planning application
- Submission of the planning application
- Post-submission of the planning application
- Construction of the Upgrade

3.16 Further detail on these consultation phases is set out in the following sections.

4 Overview of Pre-Submission Communication and Consultation Undertaken

4.1 During the pre-submission period, Thames Water undertook the following tasks:

- Pre-application Stakeholder Forum meetings
- Briefings for groups and organisations, including local residents
- Pre-application meetings with LBE and other stakeholders and consultees
- Environmental Impact Assessment Scoping Consultation
- Phase 1 consultation (16 week public consultation process)
- Phase 2 consultation (7 week public consultation process)

4.2 Thames Water has sought to engage as widely as possible with stakeholders and the general public at every stage of the process following the plan set out in its consultation strategy. The sections below detail the activities carried out at each stage.

5 Pre-Phase 1 Consultation (2011 – July 2012)

- 5.1 Prior to the phase 1 consultation process, Thames Water engaged with local authorities, and technical and statutory consultees.

Stakeholder meetings

- 5.2 Meetings held with stakeholders prior to the phase 1 consultation, including those listed below. Further details relating to individual stakeholders are provided in Section 9 of this Statement of Community Involvement.

Table 5.1: Pre-phase 1 consultation – stakeholder meetings

Stakeholder	Dates include:
Infrastructure Planning Commission	18 May 2011
LBE (Planning and Regeneration)	20 May 2011 13 January 2012 23 April 2012
Lee Valley Regional Park Authority	23 May 2011 8 December 2011
Greater London Authority	25 May 2011
London Borough of Haringey	23 June 2011
London Borough of Waltham Forest	12 May 2011
Defra	6 July 2011
National Grid (<i>in relation to the North London Network Reinforcement NSIP</i>)	18 July 2011
Camden Plant (operators of the Thames Water owned site at Lower Hall Lane)	12 Jan 2012 27 April 2012

Stakeholder Forum and workshops

- 5.3 Engagement with local authorities and technical and statutory consultees was undertaken through a series of Stakeholder Forum meetings, together with briefings and workshops.

- 5.4 These Forum meetings enabled Thames Water to present their proposed approach for the Upgrade to the stakeholders and to gain feedback. This included presentations on how to secure early engagement in the development of the proposals, and the proposed consultation strategy, and presentations on the proposed Upgrade and key issues relating to its development. The following meetings were held as part of the pre-phase 1 consultation process:

- Meeting 1: 15 July 2011, Penridge Suite, New Southgate, Enfield
- Meeting 2: 7 October 2011, Penridge Suite, New Southgate, Enfield
- Meeting 3: 13 January 2012, Penridge Suite, New Southgate, Enfield
- Meeting 4: 27 April 2012, Penridge Suite, New Southgate, Enfield

- 5.5 A full list of Forum members is provided in Appendix 2, the regular attendees included:

- LBE
- London Borough of Waltham Forest
- London Borough of Haringey
- Environment Agency
- Defra
- Thames 21
- Lee Valley Regional Park Authority
- British Waterways (Canal and River Trust)
- Greater London Authority
- Transport for London
- North London Waste Authority

5.6 The Stakeholder Forums identified an interest in further specialist stakeholder workshops. The aim of the workshops was to bring specific groups together to discuss particular topics of interest in a level of detail that was not appropriate for the wider ranging Forum meetings, such as on site selection or odour.

5.7 On 19 August 2011 a series of workshops were held covering consultation, methodology/site selection, odour strategy and transport strategy. Stakeholders could attend as many or as few of the workshops as they were interested in. Several stakeholders attended the full day. In November 2011 there was a further series of workshops covering site selection, options for renewable energy, and odour modelling.

Site visits

5.8 A series of site visits have been held in order to allow stakeholders to better understand the project by viewing the existing Deephams Sewage Works and learning about the treatment processes, the issues which the site is facing and why the Upgrade is needed.

5.9 Site visits were held in March, June, July and August 2011, as well as additional site visits that were run for Enfield Councillors in October 2011.

5.10 Relevant local authorities and technical consultees were then formally consulted on the proposed consultation strategy. Thames Water formalised their strategy for consulting the local community in a Statement of Community Consultation (SOCC), which was published in local newspapers (the Enfield Independent, Haringey Independent and Waltham Forest Guardian) and on the Deephams consultation website (www.thameswater.co.uk/deephams) on 4 July 2012. The SOCC formed part of a wider Consultation Strategy for the Deephams Sewage Works Upgrade, which set out Thames Water's approach to consulting all those with an interest in the Upgrade, including customers, key stakeholder and statutory consultees.

Pre-consultation briefings for groups and organisations, including local residents

5.11 The phase 1 consultation was launched on 4 July 2012 with two briefing sessions in Edmonton for Councillors, local authority officers and members of the Stakeholder Forum. Fifteen stakeholders attended and asked questions on subjects ranging from how much the project is likely to cost, to the preferred site. An email was sent to approximately 150 stakeholders to tell them that the consultation was open and provide the link to the website and details of the consultation events.

6 Phase 1 Consultation (3 July 2012 – 24 October 2012)

- 6.1 During the phase 1 consultation, which ran from 4 July until 24 October 2012, Thames Water consulted on the need for the proposed Upgrade, the sites where Thames Water could potentially build the Upgrade and the preferred site, the range of potential sewage treatment options considered for the Upgrade, and initial proposals for the development.
- 6.2 Thames Water provided information on a longlist and shortlist of sites, the process undertaken, the reasons for identifying the preferred site and a range of potential treatment technologies. In addition, Thames Water also presented the property/legal, planning, environmental and engineering issues that were identified and considered during the site assessment work at this stage.
- 6.3 Information was provided on how Thames Water proposes to build the Upgrade on the preferred site, as well as on the other shortlisted sites, if one of them were to become the preferred site at a later stage of assessment. Information was also presented on the proposed timetable and process of securing permissions to build the Upgrade.
- 6.4 Thames Water also consulted on the way they had carried out the phase 1 consultation, including views on the information provided, exhibitions, website and feedback forms.

Who was consulted

- 6.5 Thames Water consulted:
- Community consultees, including members of the public, local property owners/occupiers, local businesses, community representatives and groups, including hard-to-reach or seldom heard groups, within the 'consultation zone'. This zone is defined as within 250m from the boundary of each shortlisted site and within 1km from the boundary of the preferred site i.e. Deephams Sewage Works.
 - Technical consultees, including local authorities, other statutory consultees, utilities, and pan-north London and pan-London strategic stakeholders. A list is provided in Appendix 1.

How they were consulted

- 6.6 Thames Water consulted with stakeholders and interested parties through the following means:
- Over 18,000 letters, leaflets and postcards were sent out to properties located within 250 metres from the boundary of the shortlisted sites and within 1 km from the boundary of the preferred site. The leaflets briefly described the proposals and gave details of the exhibitions.
 - A Project Overview Report (attached on CD at Appendix 5) and associated technical reports were published
 - A dedicated website with information on the Deephams Sewage Upgrade Works was set up.
 - A dedicated Deephams phone number allowed calls to be handled by a trained team with access to all of the information.

- Advertisements were placed in local newspapers (Enfield Independent, Haringey Independent and Waltham Forest Guardian). This took the form of publishing the Statement of Community Consultation which contained full details about the project. A copy of the SOCC is provided on CD in Appendix 4.
- Posters were displayed and leaflets made available at public buildings such as libraries, council offices and transport hubs in the local area to promote the consultation events and give information on the proposed Upgrade.

6.7 Thames Water also produced leaflets and more detailed consultation reports on the proposals, which were available on the consultation website and at exhibitions, local libraries and town halls. These covered topics such as how the Upgrade will be funded, environment, being a good neighbour, odour, longlisted sites, shortlisted sites and how we searched for and chose our preferred site.

6.8 In carrying out the consultation, Thames Water sought to ensure that it was possible for everyone to be involved. Consultation information was available on request in large print, Braille, or audio format. In addition, Thames Water offered a telephone service translating materials to any language on request. Translated versions of five key leaflets were produced in the main languages (other than English) most often used in the area around Deephams Sewage Works. These were Bengali, French, Polish, Somali and Turkish.

6.9 An initial round of five public exhibitions were organised from 16 July 2012, where people had the opportunity to meet staff from the Upgrade project team, ask questions and receive assistance with completing the paper feedback forms.

Table 6.1: Phase 1 consultation – public exhibition venues

Date	Time	Venue	Public contacts
Monday 16 July 2012	12pm to 8pm	Community House, 311 Fore Street, Edmonton, N9 0PZ	3
Tuesday 17 July 2012	12pm to 8pm	Dugdale Centre, Enfield Town, 39 London Road, Enfield, EN2 6DS	15
Wednesday 18 July 2012	12pm to 8pm	Edmonton Green Library, 36-44 South Mall, Edmonton, N9 9TN	8
Thursday 19 July 2012	12pm to 8pm	Angel Community Centre, Raynham Road, Edmonton, London, N18 2JF	3
Friday 20 July 2012	12pm to 8pm	South Chingford Library, 265 Chingford Mount Road, Chingford, E4 8LP	8

6.10 Following the relatively low number of contacts with the public during the initial round of exhibitions, a further round of consultation roadshows were organised from 22 September 2012 at venues that local people would be more likely to visit anyway, such as shopping centres, supermarkets and train stations.

Table 6.2: Phase 1 consultation – consultation roadshow venues

Date	Time	Venue	Public contacts
Saturday 22 September 2012	10am to 5.30pm	Edmonton Green Shopping Centre, South Mall, Enfield, London N9 0TZ	216
Monday 24 September 2012	7am to 11am 4pm to 6pm	Tottenham Hale Train Station, Ferry Lane, Tottenham, London, N17 9LR	172
Tuesday 25 September 2012	9am to 5.30pm	Palace Gardens Shopping Centre, Enfield, EN2 6SN	102
Saturday 29 September 2012	9am to 3pm	Transforming North East Enfield Community Event, Co-op Unity (car park), 654-670, Hertford Road, Enfield, EN3 6LZ	88
Wednesday 3 October 2012	9am to 6pm	Enfield Sainsbury's, 3 Crown Road, Enfield, EN1 1TH	84
Thursday 4 October 2012	9am to 2pm 5pm to 6pm	Low Hall Sainsbury's, 11 Walthamstow Avenue, London, E4 8ST	26

- 6.11 A separate consultation event was held for the residents of Picketts Lock Lane, which borders the Deephams Sewage Works site to the north. Letters were sent out to 60 residential properties on Picketts Lock Lane promoting the consultation event, along with copies of the 'Our Preferred Site' leaflet, paper feedback forms and freepost envelopes. A total of seven residents attended the event.

Table 6.3: Phase 1 consultation – Picketts Lock Lane residents briefing

Date	Time	Venue	Public contacts
Monday 24 September 2012	7pm to 9pm	Ron Pickering Room, Lee Valley Athletics Centre, Meridian Way, Enfield, N9 0AR	7

- 6.12 In addition to the above, further meetings were held during the consultation period with Lee Valley Regional Park Authority officers, the Environment Agency, LBE planning policy officers, and with LBE and other parties in respect of the proposed Lee Valley Heat Network.

Phase 1 consultation feedback

- 6.13 A total of 36 consultation responses were received, submitted by 34 different respondents. The responses showed clear support for the need to upgrade Deephams Sewage Works and to improve river water quality.
- 6.14 While some community respondents were against the preferred option of developing the Upgrade on the existing Deephams Sewage Works site, a significant majority supported this approach. There was clear support amongst the technical and statutory consultees for the options of upgrading on the existing Deephams Sewage Works site. Detailed analysis of the consultation responses lead to Thames Water confirming its selection of the existing site as its preferred location for the Upgrade.

- 6.15 Both technical, stakeholder and community respondents raised concerns about the potential impacts of the Upgrade on the local environment and local residents, particularly about odour and other potential impacts, such as noise and traffic, during the construction and operation of the Upgrade. The need to deliver a significant reduction in odour emissions from the site, compared to existing levels, was the most often stated issue to be addressed.
- 6.16 Full details can be found in the Phase 1 Consultation Feedback Report, attached on CD at Appendix 6.

7 Pre-Phase 2 Consultation (October 2012 – February 2014)

7.1 During the period between the phase 1 and phase 2 consultations, Thames Water maintained its engagement with local authorities, technical and statutory consultees and members of the public.

Pre-application discussions with LBE and other stakeholders and consultees

7.2 Meetings held with stakeholders prior to the phase 2 consultation included those listed below. Further details relating to individual stakeholders are provided in Section 9 of this Statement of Community Involvement.

Table 7.1: Pre-phase 2 consultation – stakeholder meetings

Stakeholder	Dates include:
Lee Valley Regional Park Authority	17 April 2013 13 February 2014
London Waste and North London Waste Authority	20 February 2013 10 July 2013 9 October 2013
Transport for London	22 July 2013
LBE (including meetings with LBE consultants AMEC)	25 January 2013 (2 meetings) 11 February 2013 14 March 2013 18 April 2013 30 May 2013 20 June 2013 21 June 2013 2 July 2013 6 September 2013 17 October 2013 (Scrutiny Committee) 29 October 2013 22 November 2013 29 November 2013 19 December 2013 16 January 2014 3 February 2014
Canals and Rivers Trust	10 December 2013
LBE Member Briefings	11 February 2013 10 February 2014
English Heritage	10 June 2013
Greater London Authority	23 November 2012 8 January 2013

7.3 There was also email correspondence with a number of stakeholders including the Environment Agency and the Greater London Authority.

Stakeholder Forum and workshops

- 7.4 Engagement with local authorities and technical and statutory consultees was undertaken through a series of Stakeholder Forum meetings. Stakeholder Forum meetings were held on 29 November 2012, 20 May 2013, 27 November 2013, and on 6 February 2014, just prior to commencement of the phase 2 consultation. Thames Water also sent out email updates to the members of the Stakeholder Forum in March 2013 and in August 2013.

Briefings for organisations, elected representatives and members of the public

- 7.5 Briefings for elected members were held just before the phase 2 consultation began. LBE Labour and Conservative Councillor group briefings were held on 10 February 2014 and a briefing for LVRPA Planning Committee was held on 13 February 2014. Andy Love MP was briefed on the Upgrade on 28 November 2012, 11 October 2013, and 24 January 2014.

8 Phase 2 Consultation (18 February 2014 – 8 April 2014)

8.1 The next formal stage of consultation on the Upgrade was the phase 2 consultation, held in Spring 2014.

What was consulted on

8.2 The phase 2 consultation ran for 7 weeks from 18 February to 8 April 2014. It sought to gain views on our plans for building the Upgrade, the proposed and alternative layouts for the upgraded sewage works, on our proposals for reducing odour produced by the works and for reducing noise and dust during construction. It also sought feedback on proposals for managing traffic while the Upgrade is built, on assessing and reducing our impact on the environment and on the benefits the Upgrade will provide for the local community.

Who was consulted

8.3 Thames Water consulted:

- Community consultees, including members of the public, local property owners/occupiers, local businesses, community representatives and groups, including hard-to-reach or seldom heard groups within the 'consultation zone' (1km from the boundary of Deephams Sewage Works).
- Technical consultees, including local authorities, other statutory consultees, utilities, and pan-north London and pan-London strategic stakeholders. A list is provided in Appendix 1.

How Thames Water consulted

8.4 Thames Water consulted with stakeholders and interested parties through the following means:

- Sending out approximately 18,500 letters, leaflets and postcards to properties located within 1km from the boundary of Deephams Sewage Works. The leaflets briefly described the proposals and gave details of the drop-in sessions and how to take part in the consultation.
- Setting up a dedicated website with information on the Deephams Sewage Works Upgrade (www.thameswater.co.uk/deephams).
- Leaflets were displayed and made available at public buildings such as libraries and council offices in the local area to promote the consultation events and give information on the proposed Upgrade.
- Thames Water also produced leaflets on the proposals, which were available on the Deephams website and at drop-in sessions, local libraries and council offices.

8.5 The following leaflets were produced:

- Overview
- Our proposed Upgrade
- Odour
- Being a good neighbour
- Environment
- Have your say
- Feedback form
- Comment card

- 8.6 In addition to the leaflets, a more detailed Project Overview consultation document was produced, attached on CD at Appendix 7. This report provided an overview of the project, outlining the process Thames Water followed in preparing its proposals for the site, and outlining its proposals for minimising the environmental effects of the Upgrade.
- 8.7 In carrying out the consultation, Thames Water sought to ensure that it was possible for everyone to be involved. Consultation information was available on request in large print, Braille, or audio format. In addition, a telephone service translating materials to any language on request was offered. Thames Water also produced translated versions of the 'Our proposed Upgrade' leaflet and feedback form in the main languages (other than English) most often used in the area around Deephams Sewage Works. These were Bengali, French, Polish, Somali, Greek and Turkish. These translated documents were available at the Enfield Strategic Race and Equality Forum meeting on 24 March 2014 (see table 8.2 below) and on request.
- 8.8 From 26 February 2014, 11 drop-in sessions were organised, where people had the opportunity to meet staff from the Upgrade project team, ask questions and receive assistance with completing the paper feedback forms and comment cards.

Table 8.1: Phase 2 consultation drop-in sessions

Date	Venue	Time	Public contacts
Wednesday 26 February 2014	Lea Valley Athletics Centre, 61 Meridian Way, Edmonton, N9 0AR	12 to 8pm	9
Saturday 1 March 2014	Edmonton Green Shopping Centre, N9 0TZ	10am to 5pm	312
Wednesday 5 March 2014	Edmonton Green Station, Station Approach, Lower Edmonton, N9 7AA	7.30 to 10am and 3 to 6pm	526 leaflets handed out
Saturday 8 March 2014	Edmonton Green Shopping Centre, Edmonton, N9 0TZ	10am to 5pm	243
Wednesday 12 March 2014	Green Towers Community Centre, 7 Plevna Road, Edmonton, N9 0BU	12 to 8pm	1
Friday 21 March 2014	Edmonton Green Station, Station Approach, Lower Edmonton, N9 7AA	7.30 to 10am and 3 to 6pm	519 leaflets handed out
Saturday 22 March 2014	Edmonton Green Shopping Centre, Edmonton, N9 0TZ	10am to 5pm	332
Wednesday 26 March 2014	Silver Street Station, Edmonton, N18 2UE	7.30 to 10am and 3 to 6pm	744 leaflets handed out
Friday 28 March 2014	Bountagu Hub coffee morning, Bounces Road, Edmonton.	10am to 12pm	8
Friday 28 March 2014	Edmonton Green Station, Station Approach, Lower Edmonton, N9 7AA	7.30 to 10am and 3 to 6pm	671 leaflets handed out
Tuesday 1 April 2014	St Peter's Church Hall, Bounces Road, Edmonton, N9 8LE	12 to 8pm	17

- 8.9 In addition to the drop-in sessions Thames Water attended a number of meetings in the local community where it gave a presentation on the proposals for the Upgrade and provided the opportunity for attendees to ask questions.

Table 8.2: Phase 2 consultation – community attended meetings

Date	Time	Venue	Public contacts
Tuesday 11 March 2014	6:30pm	Edmonton Neighbourhood Panel	15
Tuesday 18 March 2014	11.15am	Enfield Over 50s Forum	10
Tuesday 18 March 2014	4.00pm	Edmonton Leaside Partnership	21
Tuesday 18 March 2014	7.30pm	Edmonton Green, Haselbury and Upper Edmonton Area Forum	34
Thursday 20 th March 2014	6:00pm	Shires Estate Working Group	7
Thursday 20 th March 2014	7:00 pm	Edmonton Partnership	18
24th March	6:00 – 8:00pm	Enfield Strategic Race and Equality Forum	21
Tuesday 1 April 2014	Evening	Jubilee, Lower Edmonton and Ponders End Area Forum	28

- 8.10 Over 18,500 properties received information on the Upgrade through the post, and contact was made with over 1100 people at the Thames Water organised drop-in sessions and the community events Thames Water attended. In addition, thousands of leaflets were handed out at the drop-in sessions organised by Thames Water.
- 8.11 Thames Water continued to hold meetings with stakeholders during the phase 2 consultation period, and attended briefings and provided site visits to the Deephams Sewage Works site. Meetings during this period included five meetings with LBE officers between February and April 2014 on the use of local labour during construction, potential impacts of construction on trees and biodiversity, planning policies, and the Upgrade generally. Site meetings were held with LBE and Lee Valley Regional Park officers. Thames Water also attended the LBE Scrutiny Committee meeting on Odour, on 3 April 2014.

Phase 2 consultation feedback

- 8.12 A total of 57 consultation responses were received. Comments were completed online, through comments cards and feedback forms, by letter and email, and by telephone and in person.
- 8.13 The overwhelming majority of the responses support the Upgrade proposals. Although many support the proposed significant reduction in odour emissions that was set out in the phase 2 consultation material, both LBE and a number of local residents sought a further reduction in odour emissions from the site.
- 8.14 In response to the feedback from the phase 2 consultation and, a petition submitted to LBE, and meetings of LBE's Scrutiny Committee, Thames Water has committed to implement additional odour mitigation measures to further reduce odour emissions, a significant change from the position on which the phase 2 consultation was based. The proposals to be submitted for planning approval will include measures to cover additional parts of the sewage works and implement additional odour controls.

Thames Water will also continue to implement robust odour management procedures defined within an Odour Management Plan for the site.

- 8.15 The phase 2 consultation proposals involved covering and odour controlling the two smelliest parts of the works:
- Inlet works
 - Primary settlement tanks
- 8.16 Following consideration of the consultation feedback, Thames Water is now proposing, in addition to the above, to also cover and odour control:
- The anoxic zones of the aeration lanes
 - The secondary digesters
- 8.17 This is a significant change from the phase 2 consultation position. It will take 99 per cent of existing properties outside of the areas most or moderately affected by odour, going beyond what is necessary to be in accordance with the national and local planning policies.
- 8.18 Other concerns were expressed about the potential temporary impacts on the environment and local community, particularly from noise, dust and traffic, during the construction works. Each of these issues is addressed in the planning application and Environmental Statement, including a Transport Management Plan, Travel Plan, and Construction Environmental Management Plan in order to mitigate the potential impacts of the Upgrade on the local environment and local residents.
- 8.19 Full details can be found in the Phase 2 Consultation Feedback Report, attached on CD at Appendix 8.

Post-phase 2 consultation period

- 8.20 As part of the finalisation of the planning application, discussions with LBE, Environment Agency, Greater London Authority, and other stakeholders have continued to take place following the conclusion of the phase 2 consultation. Four meetings have been held with LBE officers to discuss the use of local labour during construction (joint meeting with Job Centre Plus), planning policies, trees and biodiversity (meeting also held with Lee Valley Regional Park Authority) and the Upgrade generally. A site visit was also held for the Canals and Rivers Trust. Thames Water also attended a meeting with GLA officers to discuss renewable energy, water freight and other issues, and a meeting with the Environment Agency regarding flood risk.
- 8.21 Thames Water has also continued to consult with the local community following the phase 2 consultation. A site tour day was held at the Deephams site on 17 May 2014, which provided an opportunity for visitors to understand more about the sewage works and to learn and talk to staff about the changes proposed in the Upgrade. Approximately 1100 invitations were sent to the properties closest to the Deephams Sewage Works site. Tours were run from 10am to 1pm, with 42 local residents attending.

9 Summary of Stakeholder Consultation

- 9.1 The following section provides a brief summary of the engagement held with each of the main stakeholders through until submission of the planning application, identifying any key issues which were raised and how Thames Water has considered these in finalising the details of the proposed development.
- 9.2 Separate detailed reports are available which address all responses received and considered through the phase 1 and phase 2 public consultation processes. The large number of local authorities initially consulted reflects the specific requirements under the Planning Act 2008 to notify and consult all adjoining authorities.

London Borough of Barnet (LBB)

- 9.3 The LBB was invited to attend the first Stakeholder Forum as a neighbouring authority to LBE (if the Upgrade had been an NSIP, LBB would have been a statutory consultee for the project). A representative from LBB attended the first Stakeholder Forum on 15 July 2011 to hear an introduction to the Deephams Upgrade project and to hear from the Infrastructure Planning Commission on the NSIP regime.
- 9.4 After this initial Forum meeting the LBB concluded that there would be no impact on the borough and therefore it no longer needed to attend. The LBB continued to be invited to future Forums, and received a copy of the SOCC for consultation, although it did not respond.

Broxbourne Borough Council (BBC)

- 9.5 BBC was invited to the first Stakeholder Forum as it is a neighbouring authority to LBE (if the Upgrade had been an NSIP, BBC would have been a statutory consultee for the project). BBC subsequently confirmed that due to the distance involved it did not have an interest in the project and did not need to attend. BBC received a copy of the SOCC for consultation and responded supporting the project and citing a strategic interest in planning for future sewage capacity. It had no specific comments on the SOCC.

Camden Plant Ltd

- 9.6 Camden Plant Ltd currently occupies and leases land from Thames Water to the south of William Girling Reservoir known as the Lower Hall site. Several meetings have taken place and letters have been exchanged regarding the potential future use of the site in association with the Deephams Sewage Works Upgrade either for the Upgrade itself, or for a temporary construction compound, and the implications for Camden Plant. The final proposals for the Upgrade do not involve the use of this site.

Canal and River Trust (CRT) (formerly British Waterways)

- 9.7 CRT was invited to be part of the Stakeholder Forums, and subsequently sent a representative to the first Forum on 15 July 2011 and also to the methodology session of the stakeholder workshops on 19 August 2011 and on 29 November 2011.
- 9.8 At the first Forum it enquired whether the discharge point would remain in the same place and explained the importance of the design of the Upgrade and the public realm surrounding it.
- 9.9 A meeting between Thames Water and CRT took place on 10 December 2013 to update them on the project. An email exchange following this answered outstanding

questions relating to water quality and discharges from the sewage works at Deephams. A further meeting was held with CRT on site on 11 April 2014, with discussions on the assessment of the potential for the use of water freight during construction taking place prior to the submission of the Upgrade planning application.

Defra

- 9.10 A meeting was held with Defra on 6 July 2011 to discuss the finalisation of the National Policy Statement (NPS) on Waste Water and a Defra representative attended the first two Stakeholder Forums in 2011 and the third Forum at the start of 2012. Formal communication with Defra ceased following the publication of the NPS and once it was confirmed in December 2012 that the preferred option would not be an NSIP.

Iain Duncan Smith MP

- 9.11 Iain Duncan Smith MP, the Member of Parliament for Chingford (the area to the East of the William Girling Reservoir) was sent a letter and briefing note on 24 August 2011 and was invited to attend a site visit, which was not taken up. An offer of a briefing prior to the phase 1 consultation was also made to Mr Duncan Smith, but he did not respond.

London Borough of Enfield (LBE)

- 9.12 LBE is the local planning authority responsible for the determination of the Upgrade planning application. Engagement with LBE has been continuous throughout the preparation of the development proposals and planning application. A list of meetings and other discussions is listed in Table 9.1 below.

Table 9.1: LBE meetings and liaison

Date	Event
20.05.11	Introductory meeting
23.06.11	Site visits to Deephams Sewage Works & briefing for councillors
15.07.11	Stakeholder Forum
17.08.11	Meeting on consultation strategy and SOCC
19.08.11	Stakeholder workshops and site visit
05.09.11	Councillor evening briefings
07.10.11	Stakeholder Forum
10.10.11	Conservative Councillors site visit
17.10.11	Labour councillors site visit
15.11.11	Update meeting
29.11.11	Stakeholder workshop on site selection
30.11.11 – 28.02.12	SOCC consultation with local authorities including Enfield
13.01.12	Stakeholder Forum
13.01.12	Update meeting
23.04.12	Update meeting
27.04.12	Stakeholder Forum

Date	Event
04.07.12 – 24.10.12	Phase 1 public consultation
06.09.12	Update meeting
25.09.12	Planning policy meeting
02.10.12	Meeting on Upper Lee Valley Heat Network
29.11.12	Stakeholder Forum
25.01.13	Odour meeting
25.01.13	EIA Scoping meeting
11.02.13	Councillor briefing sessions
14.03.13	Planning officer site visit
20.05.13	Stakeholder Forum
30.05.13	Odour workshop
20.06.13	Meeting with LBE odour consultants (AMEC)
21.06.13	Odour meeting
04.07.13	Odour policy summary note issued from TW to LBE
06.09.13	Update meeting
17.10.13	Overview and Scrutiny Committee meeting
29.10.13	Update meeting
22.11.13	Update meeting
27.11.13	Stakeholder Forum
29.11.13	Full Council meeting – presentation of petition to Mayor on odour by Claire Whetstone (Director of Enfield Children and Young People's Services)
19.12.13	Odour meeting and site tour
16.01.14	Meeting with Director of Finance & Overview & Scrutiny Committee
03.02.14	Progress meeting
06.02.14	Stakeholder Forum
10.02.14	Briefing for Conservative & Labour Group Members
18.02.14 – 18.04.14	Phase 2 public consultation
19.02.14	Meeting with Councillor Sitkin and Officers on local employment
11.03.14	Planning policy meeting
31.03.14	Progress meeting
02.04.14	Local employment strategy meeting (joint with Job Centre Plus)
03.04.14	Overview and Scrutiny Committee Meeting
06.05.14	Progress meeting
03.06.14	Local employment strategy meeting (joint with Job Centre Plus)
03.06.14	Progress meeting
09.06.14	Discussion of draft application plans
26.06.14	Stakeholder Forum

- 9.13 As confirmed in its responses to the phase 1 and phase 2 consultation, LBE supports the use of the existing Deephams Sewage Works site for the Upgrade. The LBE has highlighted that a key issue to be addressed as part of the Upgrade is odour from the sewage works. In its phase 1 consultation response the LBE noted that the proposals do address the odour issues, but it would like to see a more proactive approach to odour management, including securing at the very least, the lowest levels of odour achievable from the site.
- 9.14 The LBE has supported the consultation process completed to date and in its phase 1 consultation response advised Thames Water that *“We would not only urge you to continue this exemplary level of engagement at the forthcoming design and engineering stages, where we feel the Council could significantly assist in understanding the key requirements and issues facing the scheme, but would cite this as an example which other developers should look to follow”*.
- 9.15 Between the two phases of public consultation, regular update meetings were held to discuss the latest position on the Upgrade. At a Full Council meeting on 29 November 2013, Claire Whetstone (the Director of Enfield Children and Young Persons’ Services) presented a petition to the Mayor calling upon the Council to put as much pressure as possible on Thames Water and Ofwat to use 21st Century technology to get rid of the smell. There was unanimous support for the recommendation, although several Councillors took the opportunity to give their particular view on the issue.
- 9.16 On 16 January 2014 a meeting discussed plans for the phase 2 consultation and for the presentation to LBE Councillors and also discussed local training opportunities in relation to constructing the Upgrade and the odour modelling taking place. On 10 February 2014, briefing sessions were held for Conservative and Labour Group Members who listened to a presentation from Thames Water and then asked questions relating to odour reduction costs, local employment and community benefits, flooding and discharges to the river. Thames Water also attended the LBE Overview and Scrutiny Committee meeting on Odour on 3 April 2014.
- 9.17 At the progress meeting with LBE officers on 3 June 2014, Thames Water confirmed that, in light of feedback from LBE and residents, the odour mitigation proposals that would form part of the planning application for the Upgrade would be significantly greater than that which formed the basis for the phase 2 consultation.

English Heritage (EH)

- 9.18 Two meetings have been held with EH since May 2011 and they have attended a number of the Stakeholder Forums. Meetings in 2012 discussed the archaeological implications of the shortlisted sites, and in 2013 discussed the baseline information that had been collected and the methodology for the cultural heritage and archaeology section of the Environmental Statement scoping report. EH also provided a contact for the Enfield Archaeological Society who were also subsequently consulted and provided some additional information about the local area.

Environment Agency (EA)

- 9.19 Regular meetings have been held with the EA throughout the development of the project and there has been regular EA attendance at the Stakeholder Forums and workshops.
- 9.20 The main issues raised by the EA relate to ensuring the new 2017 environmental permit is met and the need for an enforcement notice if it is not met. The Upgrade

application proposals will meet the new permit by March 2017, although the completion of the construction work will continue until 2018. There will be no deterioration in effluent quality during the construction work.

- 9.21 Flood risk has also been the subject of discussions with the EA, including discussion of the draft Flood Risk Assessment on 11 June 2014, as part of the finalisation of the planning application submission. The EA continues to attend the Stakeholder Forums.

Epping Forest Borough Council (EFBC)

- 9.22 EFBC was invited to attend the first Stakeholder Forum as it is a neighbouring authority to LBE (if the Upgrade had been an NSIP, EFBC would have been a statutory consultee for the project). EFBC confirmed that it would be unable to attend the Forums but would like to be kept informed. It was agreed that the Forum minutes would be sent to EFBC to keep it informed. EFBC received a copy of the SOCC for consultation but did not respond.

Essex County Council (ECC)

- 9.23 ECC was invited to attend the first Stakeholder Forum as it is a neighbouring authority to LBE (if the Upgrade had been an NSIP, ECC would have been a statutory consultee for the project). ECC confirmed that due to the distance, it does not have an operational interest in the Deephams Sewage Works Upgrade. The SOCC was sent to ECC for consultation in November 2011. On 7 December 2011 an email response was received saying that at this stage it has no comments but it would like to remain on the list of consultees for the phase 1 consultation. ECC also welcomed that the phase 1 consultation documents will include a spatial element from which it can assess potential implications for the county.

Greater London Authority (GLA)

- 9.24 There has been regular engagement with the GLA since an initial meeting in May 2011 and the GLA has been invited to and has sent representatives to many of the Stakeholder Forums and workshops.
- 9.25 As confirmed in its responses to the phase 1 consultation, the GLA supports the use of the existing Deephams Sewage Works site for the Upgrade. In January 2013 a pre-application meeting was held between Thames Water and the GLA to discuss and obtain advice on renewable energy options and to agree an approach to the energy strategy for the Upgrade. The GLA followed this up with a formal letter of response identifying the renewable energy provisions which would need to be addressed.
- 9.26 A further meeting was held with the GLA on 10 June 2014, to discuss the final renewable energy proposals and other issues relating to the Upgrade planning application.

London Borough of Haringey (LBH)

- 9.27 There has been engagement with the LBH since June 2011 and LBH has sent representatives to the Stakeholder Forums and workshops. LBH provided a response to the phase 1 consultation.
- 9.28 Key points raised by the LBH relate to the Decentralised Energy Network/Lee Valley Heat Network and the potential opportunities for the sewage works to connect with the network in the future and possibly export gas to the grid, or construct a biogas

refuelling centre as a potential fuel source for Council and local employer vehicle fleets.

9.29 Thames Water explained that it currently uses all of the biogas produced at Deephams Sewage Works and it is its current preferred strategy to continue this approach, but potential future opportunities will continue to be reviewed. A meeting to explore the potential for a biogas refuelling station and the Upgrade generally was held on 18 September 2011.

9.30 LBH Officers attended Stakeholder Forum meetings in 2011 and 2012, following which they have received invitation to Forum meetings, and the minutes of those meetings by email.

Hertsmere Borough Council (HBC)

9.31 HBC was invited to attend the first Stakeholder Forum as it is a neighbouring authority to the LBE (if the Upgrade had been an NSIP, HBC would have been a statutory consultee for the project). HBC confirmed by email that it would be unable to attend the Forums but would like to be kept informed. Forum minutes were sent out as well as the consultation on the SOCC.

Hertfordshire County Council (HCC)

9.32 HCC was invited to attend the first Stakeholder Forum as it is a neighbouring authority to LBE (if the Upgrade had been an NSIP, HCC would have been a statutory consultee for the project). It has asked to be kept informed by email.

Infrastructure Planning Commission (IPC)/ Planning Inspectorate (PINS)

9.33 On 18 May 2011 an introductory meeting was held with the IPC to introduce the project and discuss the IPC application process. An IPC representative attended the first Stakeholder Forum on 15 July 2011 and gave a presentation on the IPC application process.

9.34 A further update meeting was held on 21 September 2011. The IPC was kept informed of future Forum meetings. The SOCC and Consultation Strategy were submitted to it for review and comments were received on 7 February 2012.

9.35 As preparation of the development proposals passed through the phase 1 consultation process, it became clear that if undertaken at Deephams Sewage Works the Upgrade would not be a NSIP and would therefore not be determined by PINS (formally the IPC). PINS were formally informed of this on 21 December 2012 following publication of the results of the phase 1 consultation. No further engagement took place with PINS after this date.

Lee Valley Regional Park Authority (LVRPA)

9.36 There has been regular engagement with the LVRPA since an introductory meeting in May 2011 and a LVRPA representative has been in attendance at the majority of the Stakeholder Forums and workshops.

9.37 One of the shortlisted sites for the Deephams Upgrade was the LVRP golf course to the north of Deephams Sewage Works, which the LVRPA made clear it strongly opposed. As confirmed in its response to the phase 1 consultation, the LVRPA support the Upgrade at Deephams Sewage Works as it will involve improvements to water quality and reductions in odour and it supports the use of the existing site as it

will result in minimal disruption to the wider Park and the LVRPA's estate. Odour is a major concern highlighted in the LVRPA's phase 1 consultation response. An update meeting in April 2013 discussed the Environmental Impact Assessment (EIA) scoping process.

- 9.38 LVRPA attended the Stakeholder Forum on 6 February 2014 prior to the phase 2 consultation. On 13 February 2014 a briefing meeting was held for LVRPA Planning Committee to update it on the Upgrade proposals. Questions from members included the frequency of storm discharges to the river, the water quality of the River Lee and when the odour improvements would take place.

London Councils (LC)

- 9.39 London Councils, a cross-party organisation representing London's 32 borough councils and the City of London, was contacted at an early stage of the project and invited to attend the Stakeholder Forums. A phone call in July 2011 confirmed that the project was not viewed as sufficiently pan-London to justify commitment of resources for regular attendance but that LC would wish to be kept informed through the provisions of meeting minutes.

London Waste

- 9.40 London Waste operates the Edmonton Ecopark site to the south of Deephams Sewage Works. Thames Water made contact with London Waste in March 2011 and arranged a Deephams site visit for them. The synergies between the Deephams Upgrade and plans for the Edmonton Ecopark/North London incinerator were discussed as well as wider stakeholder relations. Update meetings were held in July and October 2013, and February 2014 with London Waste and the North London Waste Authority. This discussed the latest position on both projects and potential synergies emerging from the Thames Water Sludge Project. It also discussed sharing data on odour complaints.
- 9.41 A site visit was undertaken on 5 March 2014 at which London Waste's technical consultants were present. Odour emissions from the EcoPark were discussed during the visit.

Andy Love MP

- 9.42 Andy Love MP, the Member of Parliament for Edmonton was invited on a tour of the Deephams Sewage Works site on 18 March 2011 where he was briefed on the project. This was followed by an update meeting on 14 July 2011 and a further meeting on 11 June 2012.
- 9.43 The main issues raised by Andy Love MP relate to the need to tackle the odour from Deephams and ensuring that construction traffic did not exacerbate air quality in the local area. He also emphasised the importance of consultation and getting local people on board to discuss how to tackle the smell from Deephams. The June 2012 meeting discussed plans for the phase 1 consultation in more detail and Andy Love gave further suggestions. He reiterated the key issues as being odour, traffic and cost (impact on customer bills).
- 9.44 In August 2012 Andy Love used his website to call for local residents to make their views on odour from Deephams known during the consultation and to push for the 'highest standards' from the upgraded works.

- 9.45 A further briefing and site visit was held with Andy Love on 11 October 2013 to provide an update on developments since the phase 1 consultation, particularly plans to reduce odour.
- 9.46 A meeting took place on 24 January 2014. This discussed plans for the phase 2 consultation and the latest proposals to significantly reduce the odour produced by the sewage works, as well as discussing the benefits of the Upgrade, including talking about the draft Local Employment Strategy.

Natural England (NE)

- 9.47 There has been on-going engagement since an initial meeting was held on 6 July 2011 between NE and Thames Water's environmental team to introduce the project. NE attended Stakeholder Forums and Workshops in August and November 2011, and May and November 2013, and visited the site in August 2011.
- 9.48 Natural England submitted a written response to the phase 1 consultation, in which it set out the issues that it considers the Environmental Impact Assessment of the proposed development should address. Thames Water has taken this into account.
- 9.49 Natural England has also requested that a Habitats Regulations Assessment (HRA) screening be undertaken in accordance with Regulation 61 of the Conservation of Habitats and Species Regulations 2010, with appropriate information included within the Environmental Statement. The HRA submitted with this application was prepared with input from NE, who provided comments to a draft version. These comments have been incorporated and addressed within the final version of the HRA.

North London Strategic Alliance (NLSA)

- 9.50 Engagement with the NLSA has been on-going since Thames Water presented to its Place Shaping Board on 30 November 2010 and provided a background to the Deephams Sewage Works Upgrade.
- 9.51 The NLSA was then invited to attend a Deephams site visit which took place on 18 March 2011 and which was followed by an update meeting on 7 June 2011 and a further presentation to the Place Shaping Board on 13 July 2011.
- 9.52 The Director of the NLSA has attended some of the Stakeholder Forums and the workshops and Thames Water representatives have attended the Place Shaping Board meetings and given updates on the Deephams Sewage Works Upgrade.

North London Waste Authority (NLWA)

- 9.53 The NLWA is made up of seven north London boroughs (Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest). The NLWA own London Waste and the Edmonton Ecopark to the south of Deephams Sewage Works. There has been on-going engagement since 2011 with the NLWA. The NLWA responded to the phase 1 consultation and an update meeting was held in July 2013. The potential for synergies between the Deephams Upgrade and the North London EcoPark application was discussed along with the need to minimise any impacts from simultaneous construction activities on both projects.
- 9.54 A telephone update on the project occurred in January 2014 and NLWA attended the Deephams Stakeholder Forum on 6 February 2014. Joint meetings have been held

with the NLWA and London Waste during the preparation of the Upgrade planning application.

Ofwat

- 9.55 Thames Water is in regular contact with Ofwat, the water industry regulator, and there has been specific contact in relation to the Deephams Sewage Works Upgrade. Initial funding for the Upgrade was agreed with Ofwat through the 2009 Price Review (PR09), although this was based on construction being on the Lower Hall site.
- 9.56 On 15 May 2012 a meeting was held between Thames Water and Ofwat to provide an update on progress with Deephams Sewage Works improvements and make it aware of the range of pressures that have resulted in changes being proposed to the development and preferred site. Further funding for the proposed development as it is now intended, is being agreed through the 2014 Price Review (PR14).

Thames 21

- 9.57 Thames 21 made contact with Thames Water regarding the Deephams Upgrade and was invited to join the Stakeholder Forum and to attend the Stakeholder Workshops. Thames 21 representatives attended Forums and workshops in October and November 2011, November 2012, and May and November 2013.
- 9.58 Thames 21 submitted a response to the phase 1 consultation supporting the Upgrade but expressed concerns that current plans for upgrading the sewage works may not deliver sufficient capacity. It highlights that the sewage flow that Deephams Sewage Works has to deal with when it rains can be more than six times its dry weather flow and that it is the rainfall entering the sewer pipes that is at the root of the problem, and Deephams is not big enough to hold the combined sewage and rainwater.
- 9.59 Thames 21 considers that to resolve this a wider comprehensive system of natural drainage systems have to be built within the Deephams Sewage Works catchment. It argues that cities around the world are building natural drainage systems to cope with rainwater, and that upgrading Deephams at the same time as creating natural drainage systems in neighbourhoods, represents the best combination of grey and green infrastructure.

Transport for London (TfL)

- 9.60 TfL was invited to and attended the first Stakeholder Forum on 15 July 2011 and there has been on-going engagement since then. At the first Forum the TfL representative referenced how TfL would like to see an assessment of the potential to use water based transport for freight movements during construction. At the second Forum on 7 October 2011, TfL commented that it would be looking to see an assessment of the different options including rail and water freight.
- 9.61 A meeting was subsequently held with TfL in October 2011 to provide a further introduction to the scheme, and enable initial discussions regarding traffic generation, highway network considerations and critical junction identification. TfL attended the Stakeholder Forum in May 2013, and an update meeting in July 2013 discussed the scope of the Transport Assessment and allowed TfL to give its views on what needed to be included. TfL followed up with a pre-application advice letter on 5 August 2013, which covered the information the Transport Assessment would need to provide.

- 9.62 Further to the meeting in July 2013, a technical note was submitted to TfL in August 2013 which quantified potential traffic impacts. The contents of this technical note were agreed with TfL; this included confirmation that junction modelling was not required.

London Borough of Waltham Forest (LBWF)

- 9.63 LBWF is the closest neighbouring Borough to the Deephams Sewage Works site. There has been engagement with the LBWF throughout the process following an introductory meeting in May 2011. The LBWF has sent representatives to the Stakeholder Forums and workshops as well as for a site visit in June 2011. The LBWF was supportive in its phase 1 consultation response of the general need for improvements to the current infrastructure at Deephams.
- 9.64 One of the main issues it raises relates to reducing odour. The LBWF asked if the primary settlement tanks would be covered and what the options were for reducing odour from the sludge treatment process. The LBWF was particularly interested in potential plans for use of the Lower Hall site, this being the closest site to residents within the LBWF. The LBWF also raised the issue at the Forums of local Air Quality Management Areas (AQMAs) and what impact potential changes to traffic levels caused by the project might have on these.
- 9.65 In its response to the phase 1 consultation, the LBWF states that the option of developing the Upgrade at Deephams Sewage Works will have the least impact on Waltham Forest residents and businesses and would not conflict with the land use designations within the local Waltham Forest area. However, it states that any development of the site should take into account odour and air quality, noise, employment generation and local jobs, biodiversity and traffic. A meeting in 2012 between Thames Water and LBWF focused on the development of a local employment strategy.
- 9.66 LBWF continued to attend stakeholder Forums held in November 2013 and February 2014, and its Environmental Health officer has regularly attended discussions on odour.

Welwyn Hatfield Borough Council (WHBC)

- 9.67 WHBC was invited to attend the first Stakeholder Forum as it is a neighbouring authority to LBE (if the Upgrade had been an NSIP, WHBC would have been a statutory consultee for the project). It sent a representative to the first two Stakeholder Forums. After this it informed TW that it would not be attending in future since none of the sites being considered were within the WHBC area. It asked to be kept informed by receiving the minutes from future Forums

10 Submission of Planning Application

- 10.1 Just prior to submission of the planning application, Thames Water issued its Phase 2 Consultation Feedback Report, and sent an information leaflet to the over 18,500 properties within 1km of the Deephams Sewage Works site. The information leaflet provided a summary of the feedback received as part of the consultation and highlighted the significant change to odour mitigation that Thames Water had made as a result. The leaflet also confirmed the planning application would be submitted at the end of June 2014, and provided a website address, email address and telephone number for any customer contacts on the project and a LBE website address to find out more details about how to comment on the submitted planning application.
- 10.2 A further Stakeholder Forum meeting was held on 26 June 2014 to inform Stakeholders of the final application proposals.
- 10.3 On submission of the planning application, the Deephams Sewage Works Upgrade consultation website was also updated with information regarding the planning application.

11 Post Submission Communication

- 11.1 The Town and Country Planning Regulations set minimum standards for consultation following submission of planning application. Standards of consultation for major applications are currently set out within:
- The Town and Country Planning (Development Management Procedure) (England) Order 2010, as amended;
 - National Planning Policy Guidance on consultation and pre-decision matters, updated March 2014, and
 - The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.
- 11.2 LBE will publicise receipt of the planning application by local newspaper advertisement, displaying site notices and notifying adjoining owners and occupiers. The planning application will be summarised in the Council's 'Weekly List', which is circulated to Councillors, Study Groups, Residents' Associations, Libraries and other subscribers, and is also published on the Council's website.
- 11.3 The planning application and the planning application files will be available for inspection at LBE's offices. Additionally, Thames Water have also made the entire application, including all supporting documentation, and the full Environmental Statement, its technical appendices and Non Technical Summary, available electronically to the planning authorities to enable them to upload the documents to their website.
- 11.4 Thames Water will also provide a weblink from the Deephams consultation webpages (www.thameswater.co.uk/deephams) to the LBE planning documents.
- 11.5 Stakeholders and members of the public will be able to make representations to LBE, during a statutory period of public consultation.
- 11.6 Where LBE or other parties raises queries or requests for clarification or additional information on the Upgrade proposals, Thames Water will provide responses to LBE where necessary on representations, objections, and queries received during the public consultation process to assist LBE in its determination of the application. Thames Water has entered into a Planning Performance Agreement with LBE in relation to the Upgrade planning application.
- 11.7 Thames Water will attend regular meetings with LBE officers as part of their consideration of the planning application. It will also attend and provide a presentation to a meeting of the Borough's Planning Panel. Once the planning officers have concluded their consideration of the application and prepared their report and recommendation to the Borough's Planning Committee, Thames Water will also attend the Planning Committee that determines the planning application.
- 11.8 Throughout the determination period, Thames Water will also provide the community with information and updates on the planning application through further public briefings, exhibitions and emailed updates, as encouraged by LBE's Statement of Community Involvement.

12 Post Consent / Construction Phase Communications

- 12.1 Subject to planning permission being granted for the Upgrade, Thames Water will continue to liaise with LBE, stakeholders and the local community through the construction of the approved development.
- 12.2 Thames Water acknowledges that construction requires close liaison with specific individuals or groups immediately affected. Therefore, a specific named individual will be identifiable to the local community, to act as the primary point of contact for any concerns during the construction period. They will either be located on site or contactable by mobile phone at all times when construction work is being undertaken.
- 12.3 Furthermore, in order to ensure that stakeholders and affected communities are regularly informed of the Upgrade's progress, there will be regular updates through the Deephams Sewage Works Upgrade consultation website.
- 12.4 In addition to keeping individual organisations and residents informed about the project's progress, every effort will be made to inform members of the wider community about possible disruption.
- 12.5 Following completion of the Upgrade, Thames Water will continue to explore the opportunities that exist to further develop and maintain positive relations with the local community and stakeholders. This will extend to organising site visits and educational tours of the completed Deephams Sewage Works Upgrade, utilising the new classroom facility and educational trail that will be provided as part of the Upgrade proposals.

13 Summary and Conclusions

- 13.1 LBE's Statement of Community Involvement encourages developers to undertake pre-application consultation. Through two formal stages of public consultation, along with continuing informal engagement and communication with stakeholders and interested parties, Thames Water has sought to comply with the principles and approach to community involvement set out in LBE's Statement of Community Involvement. The approach to pre-application consultation was discussed and agreed with LBE as encouraged by its Statement of Community Involvement. Thames Water has also entered into a Planning Performance Agreement with LBE as encouraged by the National Planning Policy Framework.
- 13.2 Thames Water's pre-application consultation has enabled the community and stakeholders to contribute towards developing the proposals and options for the Upgrade. A variety of community involvement methods have been used, and accurate, high-quality information has been provided through a number of sources, allowing the community as a whole, including seldom heard or harder to reach groups, to be involved with the planning process.
- 13.3 Thames Water has provided feedback to stakeholders and the community on the consultation process, the outcomes of the consultation, and how the outcomes have informed the development of the Upgrade. This is clearly demonstrated by Thames Water's commitment as part of the proposals to implement additional odour mitigation measures to further reduce odour emissions, a significant change from the position on which the phase 2 consultation was based.
- 13.4 Thames Water consider the pre-application consultation process has been undertaken in accordance with the principles and approach set out in LBE's Statement of Community Involvement and has had a positive influence upon the proposals for the Upgrade.
- 13.5 Thames Water also considers that the consultation process has resulted in positive outcomes for the community and stakeholders. Overall, Thames Water has received positive feedback from LBE and other stakeholders on the quality of the engagement and consultation that has been undertaken.
- 13.6 Following the submission of the planning application, the community and stakeholders will be consulted and have the opportunity to make representations on the formal proposals. Thames Water will also continue to provide the community with information and updates on the progress and outcomes of the planning application.

Appendix 1: List of Technical Consultees

Potentially affected local planning authority in relation to Upgrade site selection:

- Lee Valley Regional Park Authority
- London Borough of Enfield
- London Borough of Haringey
- London Borough of Waltham Forest

Neighbouring planning authorities:

- Broxbourne Borough Council
- Epping Forest District Council
- Essex County Council
- Hertfordshire County Council
- Hertsmere Borough Council
- London Borough of Barnet
- London Borough of Waltham Forest
- Welwyn Hatfield Borough Council

Other consultees include:

- British Waterways (Canal and River Trust)
- BT Group Plc
- Department for Transport
- English Heritage
- Environment Agency
- Equality and Human Rights Commission
- Greater London Authority
- Health and Safety Executive
- Health Protection Agency
- Homes and Communities Agency
- London Councils
- London Fire Brigade
- London Regional Resilience Forum
- Metropolitan and City of London Police
- National Grid
- Natural England
- Network Rail
- Office of the Gas and Electricity Markets
- Port of London Authority
- Sport England
- Sustainable Development Commission
- The Disabled Persons Transport Advisory Committee
- The Highways Agency
- The Historic Buildings and Monuments Commission for England
- Transco
- Transport for London
- UK Power Networks
- Water Services Regulation Authority (Ofwat)

Appendix 2: List of Stakeholder Forum Members

- British Waterways (Canal and River Trust)
- Defra
- English Heritage
- Environment Agency
- Greater London Authority
- Infrastructure Planning Commission (Planning Inspectorate)
- Lee Valley Regional Park Authority
- Local Dialogue
- London Borough of Barnet
- London Borough of Enfield
- London Borough of Haringey
- London Borough of Waltham Forest
- London Waste
- National Grid
- Natural England
- North London Strategic Alliance
- North London Waste Authority
- North London Waste Plan
- Thames 21
- Transport for London
- Welwyn Hatfield Borough Council

Provided on CD:

- Appendix 3: Consultation Strategy
- Appendix 4: Statement of Community Consultation (SOCC)
- Appendix 5: Phase 1 Consultation Project Overview Report
- Appendix 6: Phase 1 Consultation Feedback Report
- Appendix 7: Phase 2 Consultation Project Overview Report
- Appendix 8: Phase 2 Consultation Feedback Report